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CJA Counsel for Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARVIN NELSON,

Defendant.

3:19-cr-00112-TMB-DMS

**MOTION FOR BAIL REVIEW
HEARING**

COMES NOW Defendant Marvin Nelson, by and through counsel, and hereby moves for the scheduling of a bail review hearing.

The defense is seeking to advance a release proposal for Mr. Nelson. The proposal calls for Mr. Nelson to reside at 7654 Betnu Circle, Apartment 2, in Anchorage. The apartment has two bedrooms, and it is owned by Lisa Straker, who also resides in the apartment. There are no other residents in the apartment, and the proposal calls for home incarceration with location monitoring, and passes limited to just court, attorney meetings, medical and treatment.

United States Probation and Pretrial Services, as well as the U.S. Attorney's Office, were advised of the release proposal on August 5, 2021. Probation Officer Barbee is investigating the proposal and has informed defense counsel that Pretrial Services does not object to the filing of this motion at this time.

There are scheduling issues associated with the request. First, Mr. Nelson is currently housed at Goose Creek Correctional Center (GCCC), and is requesting Court permission to participate in the hearing via phone or video conference from GCCC. Second, defense counsel will be outside of the District of Alaska between the dates of August 23 and August 27, 2021.

It is respectfully requested that the Court calendar a bail review hearing to evaluate and consider Mr. Nelson's release proposal.

DATED this 13th day of August 2021, at Anchorage, Alaska.

CASHION GILMORE LLC
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Certificate of Service

I hereby certify that on August 13, 2021,
a copy of the foregoing document was
served electronically on:

AUSA Kelly Cavanaugh
AUSA James Klugman

s/ John P. Cashion